

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DISH NETWORK L.L.C.,

Plaintiff,

v.

AMERICAN BROADCASTING
COMPANIES, INC., CBS CORPORATION,
the FOX ENTERTAINMENT GROUP, INC.,
FOX TELEVISION HOLDINGS, INC., FOX
CABLE NETWORK SERVICES, L.L.C., and
NBCUNIVERSAL MEDIA, L.L.C.,

Defendants.

Civil Action No. 12 Civ. 4155 (LTS) (KNF)

DECLARATION OF CARLY SEABROOK

CARLY SEABROOK, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury, as follows:

1. I am Director - Copyright Administration at NBCUniversal. I have held this position since on or around November 2010. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. As part of my job responsibilities, I oversee the submission of applications for copyright registration, as well as the tracking, maintenance, storage, and retrieval of copyright registrations for, among other entities, NBC Studios LLC, Universal Network Television LLC and Open 4 Business Productions LLC. My job duties include preparation of applications for copyright registration, filing those applications and other materials necessary for registration with the United States Copyright Office ("Copyright Office"), and receiving back from the Copyright Office and maintaining the Certificates of Registration issued by the Copyright Office.

3. Attached hereto collectively as Exhibit 1 are correct copies of the following certificates of copyright registration that I received from the Copyright Office after I filed applications for copyright registration for the works identified below:

Certificate No. and Work	Owner
PA 1-765-480 (for <i>BeeWare, Grimm</i>)	Open 4 Business Productions LLC
PA 1-778-887 (for <i>Three Coins in a Fuchsbau, Grimm</i>)	Open 4 Business Productions LLC
PA 1-780-055 (for <i>Plumed Serpent, Grimm</i>)	Open 4 Business Productions LLC
PA 1-774-128 (for <i>Theatre Tricks, Law & Order SVU</i>)	Universal Network Television LLC
PA 1-774-146 (for <i>Trivia, The Office</i>)	Universal Network Television LLC
PA 1-776-312 (for <i>Jury Duty, The Office</i>)	Universal Network Television LLC
PA 1-775-976 (for <i>Special Project, The Office</i>)	Universal Network Television LLC
PA 1-777-493 (for <i>Tallahassee, The Office</i>)	Universal Network Television LLC
PA 1-756-487 (for <i>Pawnee Rangers, Parks and Recreation</i>)	Open 4 Business Productions LLC
PA 1-774-147 (for <i>The Comeback Kid, Parks and Recreation</i>)	Open 4 Business Productions LLC
PA 1-773-957 (for <i>Private Parts, Whitney</i>)	NBC Studios LLC

PA 1-777-488 (for <i>48 Hours</i> , Whitney)	NBC Studios LLC
PA 1-777-464 (for <i>Mad Women</i> , Whitney)	NBC Studios LLC

4. On April 4, 2012, I filed with the Copyright Office, on behalf of Open 4 Business Productions LLC, an application for copyright registration for the work *Island of Dreams*, an episode of the prime time series *Grimm*, together with the required filing fee and copy of the work to be registered.

5. On May 18, 2012, I filed with the Copyright Office the following applications for copyright registration, together with the required filing fee and copy of the work to be registered:

Work	Applicant
The Return Of Avery Jessup, 30 Rock	NBC Studios LLC
What Will Happen to the Gang Next Year? 30 Rock	NBC Studios LLC
Win, Lose or Draw, Parks and Recreation	Open 4 Business Productions LLC
Bombshell, Smash	NBC Studios LLC

6. As part of my job duties, I maintain copies of applications for copyright registration on my electronic Copyright Office account until the Copyright Office issues a certificate of registration based on that application. Attached hereto collectively as Exhibit 2 are correct copies of the applications identified in paragraphs 4 and 5.


7. In addition, I am informed that on May 24, 2012, an application for copyright registration, together with the required filing fee and copy of the work to be registered, was filed

on behalf of NBCUniversal Media, LLC for the following NBC News program:

Work	Applicant
Dateline NBC 5/18/12	NBCUniversal Media, LLC

8. Attached hereto as Exhibit 3 is a correct copy of the application identified in paragraph 7.

Dated: June 7, 2012
Universal City, California



Carly Seabrook